

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DARLENE SCHAEFER,

Plaintiff,

v.

I.C. SYSTEM, INC.,

Defendant.

Case No. 1:17-CV-01920-FB-SJB

**DEFENDANT’S NOTICE OF MOTION
FOR SUMMARY JUDGMENT
PURSUANT TO FED. R. CIV. P. 56**

PLEASE TAKE NOTICE that Defendant I.C. System, Inc. (“ICS”), through its counsel, Gordon Rees Scully Mansukhani, LLP, and upon the Declaration of Peter G. Siachos, Esq. and all the exhibits attached thereto, the Declaration of Michelle K. Dove, Esq. and the exhibit attached thereto, the Declaration of LiveVox, as well as the accompanying Memorandum of Law and Statement of Material Facts pursuant to Local Civil Rule 56.1, and upon all prior pleadings and proceedings herein, ICS will move this Court, before the Honorable Frederic Block at the courthouse located at 225 Cadman Plaza East, Brooklyn, New York 11201, for summary judgment to dismiss Plaintiff Darlene Schaefer’s First Amended Complaint with prejudice pursuant to Federal Rule of Civil Procedure 56.

PLEASE TAKE FURTHER NOTICE that ICS respectfully requests oral argument to the extent timely opposition is filed.

PLEASE TAKE FURTHER NOTICE that pursuant to the Scheduling Order entered March 7, 2019, the deadline to file a fully-briefed motion for summary judgment is June 17, 2019.

Dated: April 19, 2019

GORDON REES SCULLY MANSUKHANI, LLP
Attorneys for Defendant I.C. System, Inc.

By: s/ Peter G. Siachos
Peter G. Siachos, Esq.

One Battery Park Plaza, 28th Floor
New York, NY 10004
Telephone: (973) 549-2500
Facsimile: (973) 377-1911
Email: psiachos@grsm.com